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November 3, 2009

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2009 NOV -5 A 10: 07

Sue Downing
HC 1 Box 197
Elgin, Arizona 85611

AZ CORP COMMISSION
DOCKET CONTROL

Chairman Mayes and Commissioners
Arizona Corporation Commission
Docket Control
1200 West Washington Street
Phoenix, Arizona 85007-2927

Re: Docket Control # E-01575A-09-0453

Letter in Opposition to Additional Information in Support of Application and Request for Expedited Commission Consideration without a Hearing

Dear Chairman Mayes and Commissioners:

I am an intervener in the above matter. I strongly oppose Sulfur Springs Valley Electric Co-operative's ("SSVEC") application to proceed without a hearing in regard to its moratorium request. I do not believe that they have provided accurate or sufficient evidence to support the need for a moratorium for the communities of Sonoita, Elgin, Rain Valley, Canelo and Patagonia. Such a request should certainly not be granted without a hearing and an opportunity to assay their evidence.

On November 2, 2009, I mailed Data Request Set One to SSVEC to obtain fundamental information in an attempt to better understand the need for a moratorium. I asked for a reply within 10 business days. It is imperative that the right decision is made since many businesses and co-operative members will be negatively affected by SSVEC's request.

Please allow discovery to continue until December 2, 2009. I anticipate that I will have additional questions after I receive a response from SSVEC. Thereafter, pre-trial testimony could be finished by December 14, 2009 and rebuttals submitted by December 21, 2009. A hearing could be scheduled a week later.

Thank you for your attention to this matter.

Sincerely,

Sue Downing

Arizona Corporation Commission
DOCKETED

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Enclosure: Data Request Set One for Sue Downing

**Cc: Docket Control (original and 13 copies)
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007-2927**

**Snell and Wilmer (1 copy)
Bradley S. Carroll, Esq.
One Arizona Center
400 East Van Buren Street
Phoenix, Arizona 85004-2202**

November 1, 2009

Sue Downing
HC 1 Box 197
Elgin, AZ 85611

Bradley S. Carroll, Esq.
Snell and Wilmer, L.L.P.
One Arizona Center
Phoenix, Arizona 85004-2202

Re: Docket # E-0157A-09-0453

Dear Mr. Carroll:

Arizona Corporation Commission has approved my request to intervene in the matter of Sulphur Springs Valley Electric Cooperatives application for a moratorium on new electric hookups for Sonoita, Elgin, Canelo and Patagonia. In order to gain a better understanding of the issues involved with this request I have attached a data request. Please respond to my request within 10 business days. Notify me in writing within this time frame if the data can not be provided.

Sincerely,

Susan J. Downing

Attachment: Data Request Set One for Sue Downing

Data Request Set One for Sue Downing

DR 1-1 Please provide five years of monthly load data, segregated by phases (A,B and C) for the V-7 feeder, from 1 October 2004 through 1 October 2009. (MS Excel format acceptable)

DR 1-2 Provide the number of meters on the V-7 feeder by rate category for each physical zip code. If available by community, census tract, or equivalent geographic grouping used by the SSVEC would also be helpful.

DR 1-3 Based on utility bills or other sources of data, please provide the kWh usage data by rate category for each physical zip code. Provide monthly data for five years from 1 October 2004 through 1 October 2009.

DR 1-4 Customer meter data.

- a. Provide the number of active meters by rate category on 1 January 2004 in the Whetstone area on the V-7 feeder?
- b. Provide the number of active meters by rate category on 1 January 2004 in each of the Sonoita, Elgin, Canelo and Patagonia areas on the V-7 feeder?
- c. Provide the same data in a and b as of 1 October 2009.
- d. For each total number of active meters in a,b and c, provide how many of those are known to service water wells.

DR 1-5 Huachuca West Substation.

- a. Provide the original operational date for the Huachuca West Substation.
- b. Provide a list of all major components of the Huachuca West Substation to include serial numbers, specifications and manufacturer dates.
- c. Provide a list of all major improvements to the Huachuca West Substation to include type of improvements, dates and cost.
- d. Provide manufactures design capacities of all major equipment in the Huachuca West Substation.
- e. Provide conductor capacity segregated by phases (A, C, and B) after the V-7 distribution feeder leaves the Huachuca West Substation.
- f. Provide a detailed map of the area served by the Huachuca West Substation.
- g. Has any of this equipment exceeded its operational lifecycle?

DR 1-6 Huachuca East Substation.

- a. Provide original operational date for Huachuca East Substation.
- b. Provide list of all major components of the Huachuca East Substation to include serial numbers, specifications and manufacture dates.
- c. Provide list of all major improvements to the Huachuca East Substation to include type of improvements, dates and cost.
- d. Provide manufacturers design capacities of all the major equipment in the Huachuca East Substation.
- e. Provide conductor capacity segregated by phases (A, C, and B) after the two feeders leave the Huachuca East Substation by distribution feeder.

Data Request Set One for Sue Downing

- f. Provide a detailed map of the area served by the Huachuca East Substation showing the two different distribution feeders.
- g. Provide all rational for all expansions at the Huachuca East Substation.
- e. What geographical areas does it serve today?

DR 1-7 V-7 Feeder Data for the area from Huachuca Substation to the proposed substation in Sonoita at the intersection of State Highway 83 and Papago Springs Road

- a. Provide all electric control equipment and reason for equipment use.
- b. Provide locations of public and private lands the feeder crosses.
- c. Provide locations of all prescriptive easements.
- d. Provide locations of all written easements.
- e. Provide conductor capacities by phase (A, C, & B).

DR 1-8 Provide a list of all pending electric applications that the moratorium would impact including demand requirements for each.

DR 1-9 Inquiries made by developers, corporations, ranches, government agencies, mining and development companies.

- a. Provide a detailed list of any and all prospective customers that have made written or verbal inquiries requesting electric service in SSVEC's service area west of Arizona State Route 90 for any time in the future, which have been received in the past 10 years. This list needs to include location, type or size of service and anticipated start up dates.
- b. Please provide a list of any of those in a. above that have declined to develop in the V-7 feeder area because of issues concerning electricity.
- c. For that in b. above, please provide a copy of all documentation between SSVEC and any potential customers that concerns electrical issues in the V-7 feeder area.
- d. Provide detailed list of all prospective customers as of October 1, 2009 that have executed contracts for electrical service in SSVEC's service area west of Arizona State Route 90 in the past ten years that have not yet received an energized service.

DR 1-10 Peak Data for the V-7.

- a. Provide a definition of "peak" as it relates to the V-7 feeder.
- b. List and describe what criteria SSVEC uses to determine "peak" for the V-7 feeder?
- c. Is this criteria in b. adopted from documented manufacturer technical information and/or SSVEC practices or policies, if so, provide a copy of the relevant part of this documentation? If your answer is yes, identify the source and any modifications if made thereto. If your answer is no, describe who then drafted the criteria and upon what that was based.
- d. Has the criteria for peak on the V-7 changed in the last 20 years? If so, describe the changes made and when they occurred.
- e. Describe the technical modifications that have been made to the substation equipment, feeder distribution line and/or support equipment to specifically address this issue?

Data Request Set One for Sue Downing

- f. Provide a list that includes date and time of day, "peak" readings or whenever capacity has exceeded 7 MW, circumstances if known and duration of when peak was reached for the V-7 feeder from 1 October 2004 to 1 October 2009.

DR 1-11 Provide a detailed list of all outages or "brown outs" from October 1, 2004 through October 1, 2009 which have occurred on the V-7 feeder. Detailed description of each occurrence needs to include the following:

- a. Physical location of problem.
- b. Date.
- c. Reason for outage.
- d. Copies of crew logs responding to outage.
- e. Estimated length of outage.
- f. Number of customer meters affected by outage.